

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Marci Clem

Case No. 2:21-mj-30298  
Judge: Unassigned,  
Filed: 06-14-2021

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 26, 2021 in the county of Jackson in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

U.S.C. § Section 841(a)(1)

Possession with intent to distribute methamphetamine

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: June 14, 2021

City and state: Detroit, Michigan



Complainant's signature

Matthew Grams, Special Agent, DEA

Printed name and title



Judge's signature

Hon. Patrica T. Morris, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Matthew Grams, being sworn, depose and state the following:

**INTRODUCTION**

1. This affidavit is in support of a criminal complaint charging Marci CLEM with possession with intent to distribute methamphetamine in violation of Title 21, United States Code, Section 841(a)(1).

2. I am a Special Agent with the Drug Enforcement Administration (DEA) and have been so employed since October 2016 and was previously employed as a law enforcement officer since 2005. I have participated in numerous investigations involving violations of federal and state narcotic and money laundering laws. I have attended schools and has been instructed in many aspects of narcotics investigations and am familiar with the narcotics laws promulgated under Title 21 of the United States Code.

3. I make this affidavit based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause and does not contain all information known to law enforcement pertaining to this investigation. As set forth in more detail below, this investigation has shown that Marci CLEM was arrested in January 2021 in the Eastern District of

Michigan with methamphetamine that she admitted she intended to further distribute in violation of Title 21, United States Code, Section 841(a)(1).

**PROBABLE CAUSE**

4. On January 26, 2021, at approximately 3:30 PM, Jackson Narcotics Enforcement Team (JNET) investigators observed Marci CLEM exit a residence in Jackson, Michigan where they were conducting surveillance.

5. CLEM then entered the driver's seat of the 2020 Dodge Ram rental vehicle. She was the only occupant. At this time, JNET investigators were aware that CLEM had a suspended driver's license and numerous warrants for her arrest. While CLEM was driving JNET investigators observed CLEM commit numerous traffic violations. Based upon the traffic violations, her arrest warrants, and suspended driver's license, JNET investigators requested the Michigan State Police (MSP) stop CLEM.

6. An MSP Trooper conducted a traffic stop of the vehicle on I-94 near Kalmbach Road in Washtenaw County. CLEM provided the MSP Trooper a fake identification card for Kyda Jo Mattson. CLEM was arrested and put in the patrol vehicle. MSP Troopers impounded the rental vehicle and conducted an inventory search of the vehicle. During the search Troopers located approximately 165 gross grams of suspected

methamphetamine, two digital scales, and packaging material inside a bag on the front passenger seat. Troopers also located drug ledgers in the center console. I know from experience that the amount of methamphetamine possessed by CLEM to be significantly more than a person would possess for personal use. Moreover, digital scales are common paraphernalia used by drug dealers to weigh out their narcotics for sales.

7. JNET investigators reviewed the drug ledgers seized during the incident. There were numerous lists of names (that I replaced for XX for this affidavit) with amounts owed. One-line states “XX owed \$200 & he bought a zip gave me \$800 fronted a quarter”. On the side of one of the ledgers is written “Marci Jo Clem.” All but one of the pages appears to list what is owed to CLEM; however, on one page, there is a list outlining money owed by CLEM where it is written “I owe XX \$800 + 68G”, “I owe XX \$4000”, and “XX – 270 left I took 66Gs. 270 + 66 + 336G (12z)”. I know from prior training and experience regarding drug trafficking nomenclature that a “zip” is slang for an ounce, a “quarter” is slang for a quarter ounce and a “G” is slang for a gram. I also know “fronting” is a common practice where traffickers provide drugs up front to customers with the expectation of receiving payment later.

8. JNET investigators later advised CLEM of her Miranda rights and conducted an interview. During the interview, CLEM admitted to selling methamphetamine. CLEM stated that she was on her way to Ann Arbor to sell the methamphetamine the Troopers seized when she was pulled over. CLEM lied about the address investigators saw her depart from and about the length of time she had the Ram rental vehicle. JNET investigators field tested the methamphetamine utilizing the TruNarc test kit, which tested positive. The suspected methamphetamine seized during the traffic stop was analyzed and tested at the DEA North Central Laboratory. Testing and analysis finalized on June 11, 2021, confirmed the substance seized was approximately 156 net grams of 100% (+/- 6%) pure methamphetamine hydrochloride.

**CONCLUSION**

9. Based on the above, probable cause exists to show that Marci CLEM possessed with intent to distribute methamphetamine in violation of Title 21, United States Code, Section 841(a)(1).

*Matthew Grams*

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Matthew Grams  
Special Agent  
Drug Enforcement Administration

Subscribed and sworn to before me  
or by reliable electronic means.



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Patricia T. Morris  
United States Magistrate Judge